

REMARKS

Claims 1-5, 15, 16, 45, 48-51 are all the claims pending in the application. Claims 1-3, and 5 have been amended and claims 49-51 have been added herein. This Response, submitted in reply to the Office Action dated January 15, 2008, is believed to be fully responsive to each point of rejection raised therein. Accordingly, favorable reconsideration on the merits is respectfully requested.

Claim Objections

The Examiner has objected to claims 1-5, 15, 16, and 45 based on certain informalities. Claims 1-3, and 5 have been amended herein and Applicant respectfully submits that all of the Examiner's concerns have been fully addressed. Therefore, Applicant respectfully requests that these objections be withdrawn.

Claim Rejections-35 U.S.C. 103

Claims 1-3, 15, 45 and 48 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Snaper et al., (U.S. 4,140,370; henceforth "Snaper") in view of Takahashi et al., (U.S. 4,921,330; henceforth "Takahashi"). Applicants respectfully traverse this rejection.

With regard to Claim 1 of the present application, the Examiner asserts that the optical screen 66 and peripheral mask 68 described in the Snaper Reference correspond in combination to the recited optical unit. Moreover, in response to Applicant's argument that Snaper does not disclose the optical screen 66 being directly attached to the display panel, the Examiner asserts that "As stated in the rejection, the optical unit includes both the optical screen 66 and frame 68 and is fixed to a part of an area {frame of the display} enclosing an image display area."

However, as described in lines 9-12 of column 4, lines 44-47 of column 4, and lines 28-33 of column 7 of the Snaper reference, reference numeral 66 denotes a planar optical screen,

reference numeral 68 denotes an attached peripheral mask, and reference numeral 70 denotes a periphery of the peripheral mask. Further, lines 31-33 of column 7 of Snaper recite "a double sided adhesive strip located on the periphery 70 of the mask so as to contact the frame or case of the television set."

The Examiner asserts that Snaper teaches the optical unit is fixed to a part of an area (frame of the display) enclosing an image display area. Accordingly, the Examiner asserts that the adhesive strip is provided at a part of an area (frame of the display). However, as described above, Snaper clearly states that a double sided adhesive strip is provided on the **periphery 70 of the mask**. In cited reference Snaper, as shown in FIG. 14, the frame part of a television receiver facing the mask 68 is recessed toward the CRT (display) part, so that even when the adhesive strip is provided on this mask 68 part, the optical unit does not adhere to the television receiver. Accordingly, as Applicant has previously asserted, in Snaper, the optical unit formed of the screen 66 and the mask 68 is fixed **not to the display (CRT) of the television receiver but to the frame or case thereof**. Conversely, in claim 1, the optical unit is adhered to the display panel itself and not a surrounding case or frame as taught by Snapper.

When an optical unit is adhered to a frame or case of a television receiver, like in Snapper, there is not a large difference in the thermal expansion coefficient between the optical unit and the frame or case because the frame or case is usually formed of plastic. However when an optical unit is directly adhered to a display, as in the apparatus of claim 1, there is a large difference in the thermal expansion coefficient, and stress is generated, creating problems such as peeling of the adhesive layer and damage to the display. The structure recited in claim 1 overcomes this problem by fixing the optical unit to a **part** of the display.

Moreover, with regard to Claim 1 the Examiner further asserts that the lenticular lens plate 3 in the Takahashi reference corresponds to the optical unit, and the Fresnel lens plate 2 corresponds to the display panel. However, in Takahashi, the Fresnel lens plate 2 and the lenticular lens plate 3 are laminated, and these two plates are mutually fixed by a tape 7 provided at their upper edges, and this composite screen is fixed to a cabinet. The Fresnel lens plate 2 is not a display panel having pixels, which differs from the present invention.

Moreover, in cited reference Takahashi, the necessity for aligning a display panel with a lens does not exist, and there is no teach or suggestion relating to alignment of the lens. Further, as the structure of Snapper does not suffer the problems described above, Applicant respectfully submits that one of ordinary skill in the art would not be motivated to seek out a solution, and would not look to Takahashi for any teachings. Therefore, Applicant respectfully submits that there is no motivation to combine Snaper and Takahashi reference.

Moreover, even if the Snaper and Takahashi references were combined, Applicant respectfully submits the combination would not be to the configuration recited in claim 1 because of the difference in configuration between claim 1 and the cited references discussed above. Therefore, Applicant respectfully submits that claim 1 is patentable over the combination of Snapper and Takahashi. Further, Applicant respectfully submits that all claims dependant from claim 1 are patentable at least by virtue of their dependencies. Therefore, Applicant respectfully requests that these rejections be withdrawn.

Further, claims 2-3, 15, and 45 depend from claim 1 and, Applicants respectfully, submit are patentable at least by virtue of their dependency. Therefore, Applicants respectfully request that the rejection of these claims be withdrawn as well.

Claims 4, 5 and 16 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Snaper in view of Eichenlaub (U.S. 5,410,345). Applicant respectfully traverses these rejections.

Claims 4, 5, and 16 depend from claim 1 and therefore incorporate all the features recited therein. In the present office action, the Examiner admits that Snaper does not teach or suggest the adhesive layer being provided such that a positional relationship between the optical unit and the display panel is maintained while permitting a difference in expansion or contraction between the optical unit and the display panel so as to permit displacement of the optical unit, as recited in claim 1. Eichenlaub does not cure this deficiency because Eichenlaub does not teach or suggest an adhesive layer having these features. Therefore, Applicants respectfully submits that claims 4, 5, and 16 are patentable at least by virtue of their dependency and respectfully requests that the rejection of these claims be withdrawn.

New Claims

Claims 49-51 have been added herein to more clearly recite the unique features and structures recited in claim 1. Applicant respectfully submits that these claims are patentable for reasons analogous to those discussed above and respectfully requests that these claims be allowed.

Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned attorney at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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